

**REMARKS**

Claims 19-41 are pending in this application.

**Rejections under 35 U.S.C. § 102**

Claims 19-33 were rejected under 35 U.S.C. 102(b) as being anticipated by Iizuka (U.S. Patent No. 5,508,743). Applicant respectfully traverses this rejection. Applicant submits that many differences exist between the claimed inventions and the disclosure of Iizuka and for the sake of brevity, only some will be discussed below. As will be fully explained, Iizuka does not disclose each and every feature of independent claims 19 and 27 as is required in a section 102 rejection.

Claims 19 and 27 utilize the feature of encoding all except the first region of the plurality of regions into encoded regions using interframe compression. Applicant respectfully submits that Iizuka does not disclose or suggest this feature. The cited portions of Iizuka disclose dividing a frame into two regions where one region overlaps another and then dividing each of those regions into blocks. In this way, Iizuka teaches that the overlapping area (i.e., Area II in Fig. 3 of Iizuka) are refreshed more often than the other area (i.e., portion of Area I outside of Area II in Fig. 3 of Iizuka) so the more important viewing area (i.e., Area II in Fig. 3 of Iizuka) is refreshed more often. Therefore, as taught by the cited portions of Iizuka, two separate areas (i.e., Areas I and II) within the frame are being refreshed. The Office is respectfully directed to column 6, lines 45-67 of Iizuka which states as follows:

As shown in FIG. 6, the number of refresh blocks is normally one or two within one frame upon assumption that one frame consists of two areas. However, as shown in a 16th frame of FIG. 7, if the positions of refresh blocks in the respective areas coincide, the number of refresh blocks is less than the number of the areas.

As the refresh blocks shift their positions within the respective areas at a constant period, the smaller one area becomes, the shorter the refreshing period becomes. Further, within an overlapped range, refreshings of two types of periods are performed, the blocks are refreshed more frequently. (Emphasis Added.)

In this manner, the structure of one frame of a moving image signal is regarded as a combination of a plurality of areas possible to be overlapped. By this arrangement, the refresh control in moving image signal coding is kept simple. Further, in this refresh control, the refresh period in a higher-interest range such as the central portion of the frame can be shortened and that in a lower-interest range such as the circumferential portion of the frame can be prolonged so that image quality within the higher-interest range can be improved, and in case of error, restoration can be quickened. (Iizuka, column 6, lines 45-67)

Therefore, Iizuka teaches the refreshing of multiple areas in the frame so that image quality in the overlapping region of the areas can be improved. In contrast, the claimed inventions encode all except the first region of the plurality of regions into encoded regions using interframe compression. Therefore, Applicant respectfully submits that the cited portions of Iizuka neither disclose nor suggests the claimed inventions of claims 19 and 27. Applicant respectfully submits that the dependent claims are allowable for at least the same reasons as independent claims 19 and 27. As a result, Applicant respectfully requests that the section 102 be withdrawn.

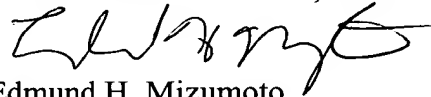
### **Rejections under 35 U.S.C. § 103**

Claims 34-41 were rejected under 35 U.S.C. 103(a) as being unpatentable over Iizuka (U.S. Patent No. 5,508,743) in view of Krishnamurthy et al. (U.S. Patent No. 6,304,295). Applicant respectfully traverse this rejection. As discussed above in the discussion regarding the section 102 rejection, at the very least, the cited portions of Iizuka do not disclose or suggest the feature of encoding all except the first region of the plurality of regions into encoded regions using interframe compression. Moreover, Krishnamurthy does not disclose or suggest the above feature. Therefore, for at least the reasons discussed above, Iizuka and Krishnamurthy individually or in combination do not disclose or suggest the features of claim 34 as is required to raise a prima facie case of section 103 obviousness against independent claim 34. Applicant respectfully submits that the dependent claims are allowable for at least

the same reasons as independent claim 34. Consequently, Applicant respectfully requests that the section 103 rejections be withdrawn.

In view of the foregoing, Applicant submits that these claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 749-6900 ext. 6927. If any additional fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. SUNMP407).

Respectfully submitted,  
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